

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF VIRGINIA
LYNCHBURG DIVISION

UNITED STATES OF AMERICA)	
)	
)	Case No.: 6:23CR00022
)	
CAROLYN BRYANT-TAYLOR, et al)	
)	

Defendant

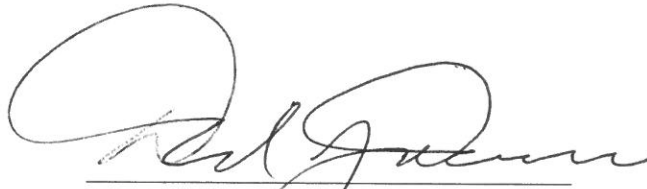
MOTION FOR CONTINUANCE

COMES NOW the Defendant, Carolyn Bryant-Taylor, by her Counsel, and moves the Court for a continuance of the trial now set for February 12, 2024. In support of this Motion, Defendant alleges as follows:

1. This case involves allegations of conspiracy, Medicaid fraud and Money laundering, laid out in a 19-page indictment; there are a total of nine defendants;
2. No discovery has been released to the defendants, but it has been suggested that the discovery is voluminous and contains medical records, billing records, discovery from a related civil case and other matters dating back to 2017;
3. The United States has identified more than thirty people on a "No Contact" list, who presumably will be potential Government witnesses, all of whom should be interviewed by the Defense;
4. Counsel for Defendant Bryant-Taylor will need significant additional time to complete the discovery and investigative process;

5. Counsel has consulted with the US Attorney's office and has been advised by AUSA Kristin Johnson that she does not object to a continuance; Counsel for the other Defendants are aware of the need for a continuance, through the exchange of emails among the parties and with the Court's Courtroom Deputy; no one has indicated any objection:
6. Counsel waives speedy trial in this matter for any time applicable for this continuance;
7. That a three-week trial, on September 23 – 27, September 30 – October 4, and October 7 – 11, 2024 is convenient for most of the participants and is available on the Court's calendar.

Accordingly, Counsel for Defendant respectfully requests that her trial, now set for February 12, 2024, be continued until September 2024 in order to allow the Defendant a reasonable amount of time to review discovery with Counsel and to give Counsel for Defendant ample time to prepare. Counsel further requests that this Court, after consideration of the factors set forth in 18 USC 3161(h)(7)(B), find that the ends of justice are served by granting of such continuance, which outweighs the interest of the public and the defendant in a speedy trial.



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Counsel for the Defendant

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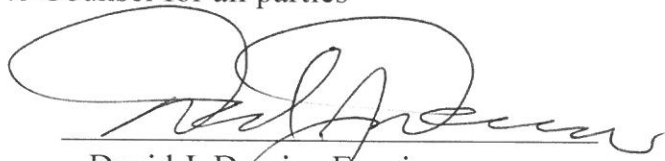
O 540 343 0888

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Counsel for the Defendant

CERTIFICATE OF SERVICE

I hereby certify that on this the 23th day of January, 2024, I electronically filed the foregoing Motion for Continuance with the Clerk of the Court using the CM/ECF system which will send notification of such filing to Counsel for all parties



David J. Damico Esquire
Counsel for Defendant